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ATTORNEYS AT LAW

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re:

Implementation of Section 4(g) of the Cable Television Consumer Protection Act of 1992

Home Shopping Station Issues

MM Docket

No. 93-8

To: The Commission

COMMENTS OF THE LONG FAMILY PARTNERSHIP

RESPECTFULLY SUBMITTED,

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Dated: March 29, 1993

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SUMMARY

The Long Family Partnership, the Licensee of independent UHF station WHKY-TV urges the Commission not to adopt any regulations that are discriminatory against television stations that broadcast programming characterized as home shopping. The mere consideration of the adoption of regulations that treat commercial television stations with disparity based on the content of programming is an affront to viewers, licensees and the Constitution of the United States of America. While it is recognized that the Congress legislatively directed the Commission to open this or a similar proceeding, the members of the Commission must remember that they have, as part of their Oath of Office, pledged to honor and protect the Constitution of the United States of America.

WHKY-TV broadcasts the only local television newscasts in its Community of License, Hickory. The revenue from home shopping programming the station carries helps to cover the costs of the newscasts. Were the station to be unable in the future to carry home shopping programming, either by direct regulation or indirect regulation, it would have to find new sources of programming and revenue or make severe cuts in hours of operation and cost of operation. There is a

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To: The Commission

COMMENTS OF THE LONG FAMILY PARTNERSHIP

The Long Family Partnership (the "Long Family"), the Licensee of station WHKY-TV, Hickory, North Carolina, hereby states its comments in response to the Commission's *Notice of Proposed Rulemaking*, in this proceeding, FCC 93-35, ____FCC Rcd____(Released January 28, 1993) ("*NPRM*").

I. WHKY-TV'S FUTURE IS IN JEOPARDY

The Commission's consideration of the Home Shopping Station Issues¹, if mishandled, could result in the actual or practical loss of Hickory's television voice, just as the Commission's actions in MM Docket 80-90 actually caused a real decrease in radio voices in Hickory.

¹The term "Home Shopping Station Issues" must be used carefully. It is important that the Commission be able to distinguish between a particular entity that is engaged in offering products for sale over television stations, the industry as a whole, and specific stations individually, *if* the Commission determines that the First Amendment and the Commission's own precedents are to be trampled with new content-based regulation.

II. WHKY-TV IS A TRUE LOCAL INDEPENDENT TV STATION

WHKY-TV is an independent, family owned, television station in the truest senses of the terms. Although it is nominally part of the Charlotte, North Carolina A.D.I.², anyone who has driven from Charlotte to Hickory knows that Hickory is not part of the Charlotte urban area. Hickory is a distinct community in and of itself that clearly has different lifestyles, forms of government and other needs and interests, all of its own.³

III. WHKY-TV IS AND ALWAYS HAS BEEN A LOCAL, FAMILY OPERATION

Co-owned with WHKY-AM, WHKY-TV⁴ operates from 6:00 AM until approximately midnight. The Long Family Partnership, the licensee of both stations, is the successor to Catawba Valley Broadcasting, Inc. ("Catawba Valley"), the stations' founder.

WHKY-TV, Hickory's only full power television station, commenced operation in 1968. At that time, Catawba Valley was the licensee of WHKY-AM, FM and TV.⁵ Three businessmen in Hickory had formed Catawba Valley and built and

commenced operation of "Standard Broadcast Station" WHKY in 1940⁶ and the FM Station in 1959. One of the three original founders of Catawba Valley was Edmund S. Long. Through the years, the stock in Catawba Valley devolved down to the descendants of the original shareholders. Pursuant to Commission authorization, the stations are now licensed to The Long Family Partnership, which consists of Edmund S. Long's descendants and family members. Thus, as compared with too many stations that are, or have been, licensed to entities that seek out a "quick buck", WHKY-TV is licensed to an entity composed of the second and third generation of its founders. They are truly broadcasters!

The Long Family's long term knowledge of, and economic relationship with, the Hickory community place the Long Family in a position of unusual knowledge from which to speak about the economics of independent local television stations.

IV. WHKY AND ITS EMPLOYEES ARE COMMUNITY INVOLVED

WHKY's employees are encouraged to be active in the community, both on the station's behalf and individually.

As explained by the Station Manager, Jeff Long:

[D]uring the Winters of 1987 and 1988, it appeared there would not be enough food available for distribution through the Thanksgiving Food Drive Programs of the Cooperation and Christian Ministry, Salvation Army and the Hickory Soup Kitchen. WHKY-TV stepped in and organized a "canned food drive" competition between the two Hickory City Intermediate Schools. The students enjoyed a station sponsored drug-free dance, with pizza and non-alcoholic beverages. But more

under call letters WEZC.

⁶see Exhibit Two

importantly, they experienced the feeling of helping others through public service team work. The real winners were the families on Thanksgiving Day who were able to enjoy a warm meal thanks to more than 3,000 cans of food raised through the event.

These and other activities undertaken by the station led to the station being honored with the 1988 Small Business of the Year Award (Service Category) presented by The Catawba County Chamber of Commerce. The Award was given to WHKY Radio and Television.

WHKY-TV employees are encouraged to actively participate in civic and community activities. Below is a non-inclusive list of such community activities:

- Catawba Valley United Way
- Hickory City Schools
- Catawba County Schools
- Hickory Rotary Club
- Hickory Jaycees
- Civil Air Patrol
- Optimist Club
- Crime Stoppers Steering Committee
- Hickory Soup Kitchen Steering Committee
- American Red Cross
- Various Church Organizations
- Hickory Oktoberfest Organization Committee
- Catawba County Sesquicentennial Committee
- July 4th Freedomfest Organization Committee
- Hickory American Legion Agricultural Fair

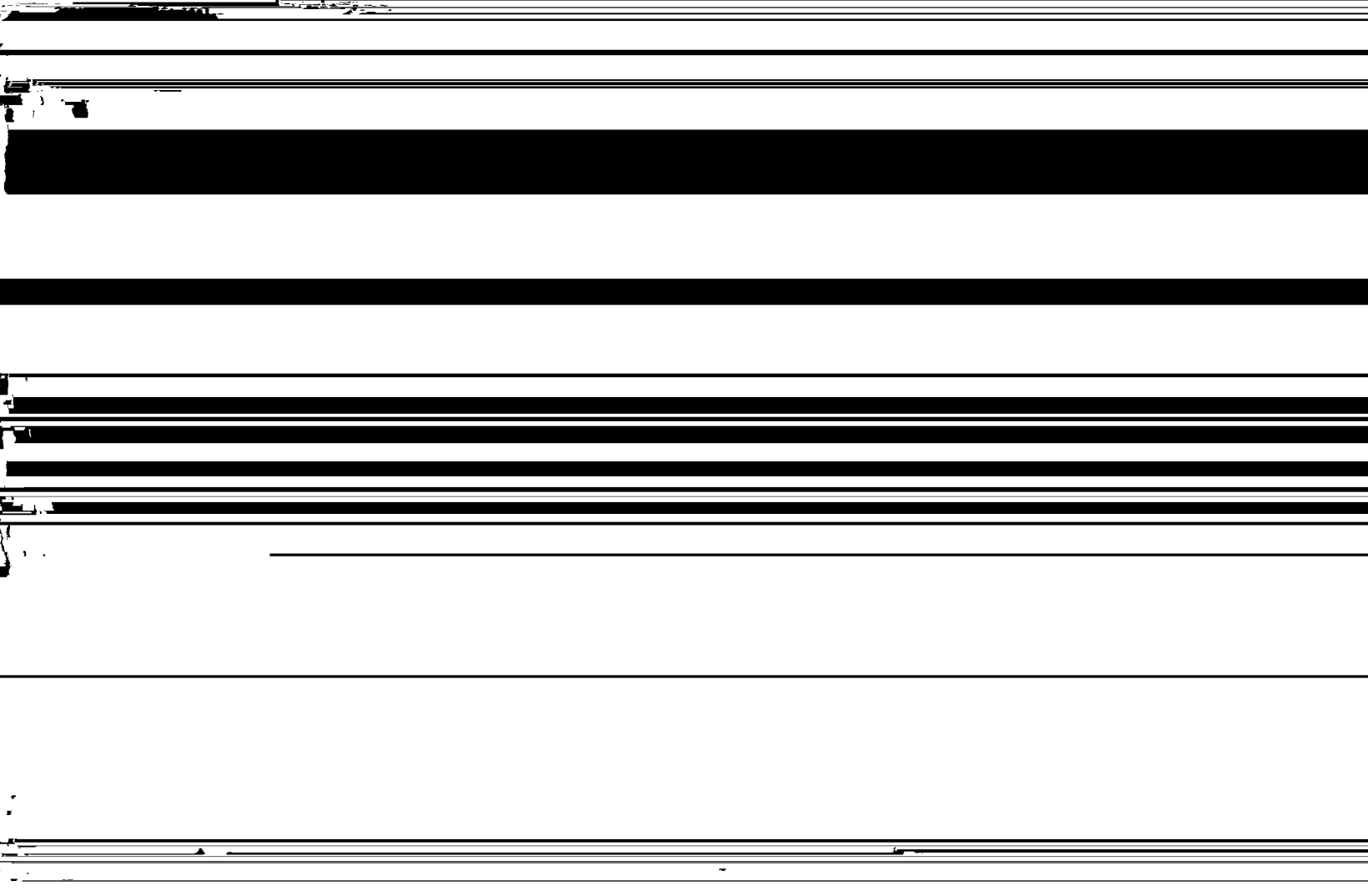
**V. THE COMMISSION'S DOCKET 80-90 "USE IT OR LOSE IT" POLICIES
LED AT LEAST ONE HICKORY FM STATION TO BE REFOCUSED TO A
LARGER MARKET**

When owned by Catawba Valley, WHKY-FM was a class C FM station that operated with facilities less than the minimum height and power specified for Class C stations in Docket 80-90. Faced with the Commission's Docket 80-90 mandate of

"use it or lose it", and unable to justify the cost of a full Class C station in Hickory, Catawba Valley sold the FM. It is now a Class C-1 station with studios in Charlotte.

**VI. WHKY-TV IS ONE OF THE FEW TRULY INDEPENDENT TELEVISIONS
AIRING LOCAL NEWS AND PUBLIC AFFAIRS PROGRAMS**

WHKY-TV is not affiliated with any of the traditional networks (*e.g.* C.B.S., N.B.C. or A.B.C.) or the Fox Network. The Commission is aware from prior surveys that few non-network affiliated television stations present any local news. And of the few that do, most are Fox affiliated, in markets of significant size, and many are VHF. There are truly very few independent UHF TV stations presenting local news and public affairs in markets of any size. Yet, WHKY-TV in relatively small Hickory



crime, that are unable to leave home to shop. That for decades, the Montgomery Wards, Spiegel and Sears Catalogs flourished demonstrates the consistent need for at home shopping services.⁷ By scheduling home shopping programming at times that local independent television station's have the greatest difficulty in otherwise earning revenue, the need of many members⁸ of the public to receive in home shopping services can be, indeed is being, met without adversely effecting the station's ability to deliver other programming. Copies of selected letters received from the public supporting the stations home shopping programming are annexed hereto as Exhibit Three. There is obviously support amongst the viewing public for the programming, and the station receives badly needed income. It is a "win-win" situation.

IX. HOME SHOPPING REVENUE SUPPORTS WHKY'S NEWS OPERATIONS

WHKY-TV is proud of its news and public affairs programming. And, WHKY-TV believes that the community response to its newscasts vindicate the licensees decision to dedicate station resources to them. Selected letters from leaders of a wide range of community organizations expressing support and appreciation for

⁷That one or more catalog services has folded or will fold, does not demonstrate that there no longer is a need. Instead, the economics of preparing, printing and delivering catalogs has so dramatically changed that the industry, like all, is undergoing a shake-out. The loss of the Sears Catalog, if anything, heightens the need for other at home shopping services, such as WHKY-TV provides.

⁸Can the members of the Commission envision that one day they too might be home- bound and thankful to be able to order a surprise anniversary present for a long-loved spouse by telephone. The Long Family respectfully submits that the ability of the home-bound that are sighted to see by television what is being ordered before it is delivered is a substantial comfort.

the news and public affairs programming efforts of WHKY-TV are annexed hereto as Exhibit Four. The cold fact is that the cost of producing local newscasts far exceeds the revenue received from them. This revenue short-fall must be covered from other sources.

**X. LOSS OF HOME SHOPPING REVENUE WOULD THREATEN
LOCAL NEWS**

The ability of the Long Family to continue to produce and air local news, weather and sports, as well as other public affairs programming is directly related to the cash generated by the Home Shopping Network programming carried over WHKY.

WHKY-TV operates with very modest facilities. By industry standards, employee compensation, including that of "key personnel", is even more modest. However, by operating the television and the AM stations together, carefully controlling expenses and tirelessly pursuing advertising sales, the stations' finances are stable.⁹ Any significant reduction in net revenues would have to be met with equivalent cost-cutting. Moreover, were the Commission to place the station in a position where it could no longer broadcast the home shopping programming, the station would be faced with a "double whammy"--it would sustain an extensive loss of revenue and a loss of program material. The net result would be that, with less revenue to operate, the station would be faced with the need to secure more programming (or reduce hours of operation).

⁹The AM station is news/talk/information formatted.

Thus, loss of its ability to broadcast home shopping programming well could result in WHKY-TV cancelling Hickory's only local television newscast. The Long Family respectfully submits that nothing could be farther from the public interest.

XI. THE FCC MUST NOT DISCRIMINATE BASED ON PROGRAM CONTENT

The Long Family has no quarrel with the programming decisions that others make for their stations. If a station's licensee determines that the public interest is served by the station broadcasting *Wheel of Fortune*, that is an appropriate exercise of licensee discretion. And, if the revenues from *Wheel of Fortune* help support news and public affairs programming, all the better.¹⁰ Certainly, in the course of a program, a lot of commercials are aired. And, at the end of the program, the list of "sponsors" identified is substantial. Is the Commission prepared to rule, (we doubt it could do so constitutionally) that the demonstration (promotion) of products is so much different on home shopping programming than, for example *The Price is Right* that one forum is ok and the other is constitutionally unprotected? Where would the Commission draw the line? We respectfully submit that any content based discriminatory rules adopted by the FCC would quickly be found unconstitutional, as several attempts of the Commission to fashion its own must-carry rules were.¹¹

¹⁰No intention to belittle or "pick on" the *Wheel of Fortune* is intended or should be inferred. Indeed, its continuing popularity commands respect.

¹¹Were the FCC to adopt any content based rules, they must be the least restrictive that would fulfill a compelling government interest. The Long Family respectfully submits that the Commission could never establish the necessary compelling government interest to justify content based discrimination against home shopping programming or stations carrying it. But were the Commission to do so,

censorship decisionmaking. Leave it to broadcasters and their viewers to determine what¹⁴ programming is right.

The Commission's decisions in and related to Docket 80-90 forced a lot of FM stations to migrate from the home-towns of america to the large cities where the cost of FCC mandated improvements in transmission systems could be amortized. Just look at what used to be Hickory's station¹⁵, WHKY-FM. Should the people of Hickory be deprived of their only TV station also, just because the Commission thinks that it has the wisdom to decide what programming should or should not be on the air? Is the Commission prepared to rule that the potential loss of Hickory's only television newscasts and public affairs programming is less important than is removal of home shopping programming from the air? Hopefully, a nation with a First Amendment to its Constitution that so clearly protects the right of the nation's citizens to speak freely has not turned its back on those Constitutional protections. The members of the Commission have taken an oath of office that requires them to protect and defend the constitution and the rights of the citizens thereunder. We trust that the members of the Commission are up to the task and will fulfill their duties.

¹⁴non-obscene, non-indecent

¹⁵Oh, its still licensed to Hickory, and the Long Family does not intend to reflect on whether the station is meeting its legal obligations.

It would be contrary to the public interest for the Commission to take action or amend its rules so that stations such as WHKY-TV could no longer use the revenue presently generated by home shopping programming to support news and public affairs programs. Indeed, news and public affairs programming is supposed to be the core of broadcast station operations. Yet, how many television stations, particularly independent UHF ones, don't present any news or public affairs programming?¹²

Adoption of rules that discriminate against stations because they broadcast home shopping programming would entangle the Commission dangerously in the very core programming decisions of its broadcast licensees, something the Commission has always, steadfastly, refused to do.¹³

The Commission has, with wisdom, refrained from considering formats and programming when determining whether to renew licenses or approve assignments of licenses or transfers of controls. For the Commission to adopt rules that treat stations differently on the basis of programming, would be for the Commission to jump, without checking the water depth, into the shallow, but murky, waters of pre-

there is a much less restrictive option--specifying maximum amounts of commercial time per hour. But, the same counting formula (*e.g.* how many minutes products that are to be sold or given away are demonstrated or promoted must be applied to all stations).

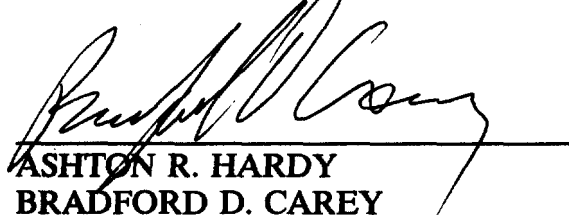
¹²except, perhaps, a few public service announcements that, while worthwhile, rarely, if at all, are locally produced.

¹³*see, e.g. WNCN Listener's Guild*, 31 RR 2d, 816, 817.

XII. CONCLUSION

The Long Family Respectfully urges that the Commission not adopt any regulations that discriminate against television stations that air home shopping type programming, whether the rules would be with respect to must-carry/retransmission consent; license renewal expectancy; or, other matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ashton R. Hardy', is written over a horizontal line.

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Dated: March 29, 1993

EXHIBIT ONE

Directory of Television Stations in the U.S.

3301 W773602). 1972. Box 14900, 10 T. W. Alexander
Dr., Research Triangle Park (27709). (919) 549-7000.
FAX: (919) 549-7201. Licensee: Univ. of N.C. ■ Net:

Lucas, progmg mgr; Richard W. Hatch, pub affrs dir;
Willard Campbell, engrg dir; Harvey Arnold, chief engr.
■ On 54 CATVs—44,520 subs. On 8 trans.

Wilmington

ADI No. 143: see Wilmington market

EXHIBIT TWO

Directory of Radio Stations in the U.S.

***WUAG(FM)**—July 20, 1964; 103.1 mhz; 18.1 w. Ant 230 ft. TL: N36 03 51 W79 48 37. (CP: Ant 259 ft.). Stereo. Taylor Bldg., Univ. of N.C. at Greensboro (27412). (919) 334-5450. Univ. of N.C. at Greensboro, Bd of Trustees. Format: Progs rock. News staff one; news progmg 2 hrs wkly. Target aud: 12-40; high school and college students. Spec prog: Jazz 3 hrs, regl 3 hrs, rap and dance 3 hrs, blues 3 hrs, metal 3 hrs wkly. ■ Susan Leigh, gen mgr; Jim Shaughnessy, gen sls mgr; Becky Nicholas, progmg dir; Eric Shepherd, mus dir; Rebecca Russell, news dir; Woodrow McDougald, chief engr.

Greenville

WNCT(AM)—1940; 1070 khz; 10 kw-U, DA-N, TL: N35 36 14 W77 25 29. Box 7167 (27835). (919) 757-0011. Park Communications Inc. (group owner; acq 1962). Net: CBS, Mutual, ABC. Rep: Major Mkt. Format: Talk. Spec prog: Farm 10 hrs wkly. ■ John Enich, vp; Scott Cherney, gen mgr; Warren Baker, prom mgr & progmg dir; Roy McCory, chief engr.

WNCT-FM—Dec 22, 1963; 107.9 mhz; 100 kw. Ant 1,800 ft. TL: N35 21 55 W77 23 38. Stereo. Net: ABC/E. Format: Easy listening. WNCT-TV affil.

WOOW(AM)—October 1959; 1340 khz; 1 kw-U, TL: N35 36 58 W77 22 14. Box 8361, 304 Evans St. (27834). (919) 757-0365. The Minority Voice Inc. (acq 8-24-88). Net: Natl Black. Wash atty: Tharrington & Hargrove. Format: Black, urban contemp, talk. News staff one; news progmg 5 hrs wkly. Target aud: 35-45; older Afro-American adult community. Spec prog: Jazz 5 hrs wkly. ■ Jim Rouse, pres & gen mgr; Dorcas Green, gen sls mgr; Jeff Sauvage, prom mgr; Abdul Rouse, progmg dir; T.L. Davis, mus dir; Tonya Booth, news dir; Eugene Underwood, chief engr.

***WZMB(FM)**—Feb 2, 1982; 91.3 mhz; 282 w. Ant 134 ft. TL: N35 36 01 W77 21 53. Stereo. East Carolina Univ., Old Joyner Library, 2nd Fl. (27858). (919) 757-6656. East Carolina Univ. Media Board (acq 2-82). Net: AP. Format: Progressive rock. News progmg 6 hrs wkly. Target aud: 18-24; university students. Spec prog: Black 10 hrs, class 3 hrs, reggae 7 hrs, jazz 5 hrs, blues 3 hrs, contemp Christian 3 hrs wkly. ■ Andrew Forbis, gen mgr; Kris Adams, prom mgr; John Burley, progmg dir; Beth Ellison, mus dir; Marcia Jauregui, news dir; Macon Dail, chief engr.

Grifton

WVVY(FM)—Sep 11, 1989; 99.5 mhz; 16.5 kw. Ant 830 ft. TL: N35 12 07 W77 11 15. Stereo. 1714 Neuse Blvd., Beaufort (28560). (919) 836-0995. Willis Broadcasting Corp. (group owner; acq 7-1-91; \$800,000; FTR 7-22-91). Format: Adult contemp. ■ Joyce McCune, gen mgr; Harry Kozlowski, progmg dir.

Hamlet

WJSG(FM)—Not on air, target date unknown; 104.3 mhz; 3 kw. Ant 328 ft. 420 Airport Rd., Rockingham (28379). Sherrell Jackson.

WKDX(AM)—June 30, 1957; 1250 khz; 1 kw-D, TL: N34 53 06 W79 40 50. Box 826 (28345). Richmond Plaza Shopping Ctr., Rockingham (28379). (919) 582-2653. FAX: (919) 895-0255. Peace Valley Baptist Church (acq 7-12-91; \$190,000; FTR 7-29-91). Net: ABC/I. Rep: T.N. Format: C&W. Target aud: General. Spec prog: Gospel 15 hrs wkly. ■ R. A. Lyon, pres; Sherrell Jackson, gen mgr, gen sls mgr, progmg dir & news dir; J.J. Jackson, mus dir; Van Billingsley, chief engr.

Hatteras

WYND-FM—Not on air, target date unknown; 97.5 mhz; 50 kw. Ant 492 ft. TL: N35 15 42 W75 33 20. 1359 Black Meadow Rd., Spotsylvania, VA (22553). (703) 972-2690. FAX: (703) 972-1309. Pamlico Sound Co. Inc.

Henderson

WHNC(AM)—June 20, 1945; 890 khz; 1 kw-D, TL: N36 21 04 W78 22 35. Box 1240, Norlina Rd. (27536). (919) 438-8111. Rigel Inc. (acq 8-1-78). Net: Unistar. Rep: Southern. Format: 40's, 50's, 60's with selected songs of the 70's & 80's. News staff one. Target aud: 35 plus; middle-age secure people. Spec prog: Black gospel 7 hrs wkly. ■ Roy O. Rodwell, pres; Terry W. Freitag, Sr., vp, gen mgr, progmg dir & mus dir; Scott Poe, prom mgr; Bob Harrison, news dir; James Scott, pub affrs dir; Terry W. Freitag, Sr., chief engr. ■ Rates: \$8.50; 7; 8.50; 7.

WIZS(AM)—May 1, 1955; 1450 khz; 1 kw-U, TL: N36 19 31 W78 24 36. Hrs opn: 5 AM-1 AM. Box 192, Studio & Transmitter Bldg., Radio Ln. (27536); Box 556, 220 White Oak Dr. (27536). (919) 492-3001; (919) 438-8218. FAX: (919) 492-5594. Rose Farm and Rentals Inc. (acq 6-1-89; \$265,000; FTR 6-19-89). Net: NBC, N.C. Net. Rep: T.N. Format: Country. News staff one; news progmg 8 hrs wkly. Target aud: 18-55; fans of top 60 country music. Spec prog: Farm 5 hrs, regl 5 hrs, big band 8 hrs wkly. ■ John D. Rose III, pres; Sylvia R. Edwards, chief opns; Peg Turner, gen sls mgr; Mike Elliott, prom dir; W. Lee Harris, progmg mgr & mus dir; Donna D. Young, news dir & pub affrs dir; Walter L. Johnson, chief engr. ■ Rates: \$6.80; 5.60; 6.80; 4.30.

WYFL(FM)—1948; 92.5 mhz; 100 kw. Ant 1,020 ft. TL: N36 13 23 W78 12 07. Stereo. 120 E. Belle St. (27536). (919) 492-9511. Bible Broadcasting Network (group owner; acq 10-3-81; \$335,000; FTR 9-14-81). Net: AP. Format: Relig. Target aud: General. ■ Lowell Davey, pres; Jim Deatherage, gen mgr; Harold Richards, mus dir & news dir; Ron Muffley, chief engr.

Hendersonville

WHKP(AM)—Oct 24, 1946; 1450 khz; 1 kw-U, TL: N35 20 20 W82 27 20. Box 2470, 1450 7th Ave. E. (28793). (704) 693-9061. Radio Hendersonville Inc. Group owner: EZ Radio Group (acq 6-4-86). Net: ABC/I, Moody, A. Rep: Southern. Wash atty: Tharrington, Smith & Hargrove. Format: MOR. News staff one; news progmg 25 hrs wkly. Target aud: 25 plus; middle-to-upper income. ■ Art Cooley, pres & gen mgr; Richard Rhodes, vp sls & sls dir; Al Hope, vp progmg & progmg dir; Allen Reese, news dir; Norman Lyda, vp engr & chief engr. ■ Rates: \$26; 14; 17; 7.

WMYI(FM)—Licensed to Hendersonville. See Greenville, S.C.

WTZQ(AM)—Dec 25, 1964; 1600 khz; 5 kw-D, 500 w-N, DA-2, TL: N35 18 07 W82 27 30. 717 Greenville Hwy. (28792). (704) 692-1600. Conner Communications Inc. (acq 5-15-89). Net: AP, N.C. News. Rep: Carolina. Format: Btl mus. News staff one; news progmg 10 hrs wkly. Target aud: 35 plus; mature adult market. ■ Ralph C. Conner, pres & gen mgr; Al B. Lake, progmg dir; Tracy Peltier, news dir; Edward McDade, chief engr.

Hertford

WKJE(FM)—Not on air, target date unknown; 104.9 mhz; 3 kw. Ant 281 ft. TL: N36 10 45 W76 21 12. E. Rock Rd., Allentown, PA (18103). Maranatha Broadcasting Co. Inc.

Hickory

WEZC(FM)—Jan 20, 1959; 102.9 mhz; 31 kw. Ant 1,545 ft. TL: N35 24 26 W81 07 47. Stereo. Suite 1380, 212 S. Tryon St., Charlotte (28281). (704) 335-1029. Keymarket of Charlotte Inc. Group owner: Keymarket Communications (acq 3-87; \$4.4 million; FTR 12-1-86). Net: Unistar. Rep: Katz. Format: Adult contemp. News staff one. Target aud: 25-54. ■ Steve Litwer, gen mgr; Don Bell, opns mgr & progmg dir; Melinda Holt, sls dir; Don Strawn, chief engr.

co-located fm; FTR 6-10-85). Net: ABC. Rep: Rosan Southern. Format: C&W. ■ Jerry Oakley, pres; Maynard Taylor, gen mgr; Jess Parks, gen sls mgr; J. Michaels, progmg dir; Eric Scott, mus dir; Dave Haron, news dir; Larry Schropp, chief engr.

WXRC(FM)—Co-owned with WIRC(AM). Dec 7, 1962; 95.7 mhz; 100 kw. Ant 1,276 ft. TL: N35 42 32 W81 31 32. Stereo. Prog sep from AM. Box 410085, Charlotte (28241-0085). (704) 392-0957; (704) 322-1713. FAX (704) 324-9329. Net: NBC the Source. Rep: Katz & Powell. Format: AOR. Target aud: 18-49. ■ Cathy Honeycutt, gen sls mgr.

***WPAR(FM)**—Dec 3, 1985; 88.1 mhz; 10 kw. Ant 300 ft. TL: N35 43 34 W81 08 52. Stereo. Box 909, Claremont (28610). (704) 459-9803. Piedmont Area Radio Inc. Net: CBN. Format: Southern gospel, educational. ■ Donald W. Lee, gen mgr; Robert Barnett, mus dir.

WXRC(FM)—Listing follows WIRC(AM).

WYCV(AM)—See Granite Falls.

High Point

WGOS(AM)—July 1947; 1070 khz; 1 kw-D, TL: N35 54 58 W80 01 00. Box 8032 (27264). (919) 434-5024. Ritchy Broadcasting Co. Inc. (acq 8-6-79). Format: C&W. ■ Simon Ritchy, pres & progmg dir; Lynn Ritchy, gen mgr & gen sls mgr; James R. Luther, chief engr.

WHPE(FM)—November 1947; 95.5 mhz; 100 kw. Ant 440 ft. TL: N35 55 10 W80 01 47. Stereo. 1714 Tower Ave. (27260). (919) 889-9473. Bible Broadcasting Network (group owner; acq 10-17-74). Net: AP. Format: Relig. ■ Lowell Davey, pres; Jud Mast, gen mgr.

WJMH(FM)—See Reidsville.

WMAG(FM)—Listing follows WMFR(AM).

WMFR(AM)—Oct 15, 1935; 1230 khz; 1 kw-U, TL: N35 57 20 W80 00 22. Hrs opn: 5:30 AM-1 AM. Box 2208 (27261); 164 S. Main St., 8th Fl. (27260). (919) 885-2191. FAX: (919) 882-4422. Voyager Communications V Inc. (group owner; acq 10-25-91; with co-located FM). Net: ABC/I. Rep: Christal. Format: News/talk. ■ Jack McCarthy, pres; Bill Johnston, gen mgr & gen sls mgr; Dennis Elliott, progmg dir; Larry Craven, news dir; Stuart Smith, chief engr.

WMAG(FM)—Co-owned with WMFR(AM). 1946; 99.5 mhz; 100 kw. Ant 1,500 ft. TL: N35 52 13 W79 50 25. Stereo. Hrs opn: 24. Prog sep from AM. (919) 882-0995. Net: Christal. Format: Adult contemp. Target aud: 25-54. ■ Bill Johnston, vp & gen mgr; Stan Thomas, gen sls mgr; Stan Bernstein, prom mgr; Kathy Reynolds, mus dir; Leanne Petty, news dir; Stuart Smith, chief engr.

WOKX(AM)—June 1953; 1590 khz; 1 kw-D, 26 w-N, TL: N35 57 41 W80 02 13. Box 1198 (27261); Suite 203, 327 N. Main (27620). (919) 882-1590; (919) 883-8852. Key Broadcasting Inc. (acq 8-80; \$135,000; FTR 8-13-90). Net: CBN. Format: Contemp Christian mus. News progmg 3 hrs wkly. Target aud: General. ■ Joel Key, pres; Ru Rose, gen mgr, gen sls mgr, prom mgr & mus dir; Brad Wright, opns mgr & pub affrs dir; Max Parrish, chief engr. ■ Rates: \$12; 12; 12.

***WWIH(FM)**—Sep 19, 1981; 90.3 mhz; 10 w. Ant 150 ft. TL: N35 58 19 W79 59 38. Stereo. Box 3071, High Point College, 933 Montileau Ave (27261). (919) 841-9000. High Point College Bd of Trustees. Format: Progressive. News staff one. Target aud: 18-24; college students. ■ Blaine J. Raffie, gen mgr.

WWWB(FM)—June 1953; 100.3 mhz; 100 kw. Ant 1,049 ft. TL: N35 58 09 W79 49 29. Stereo. Box 11028 (27265-0265); Suite 400, 4000 Piedmont Pkwy (27265). (919) 885-2100; (919) 333-2100. FAX: (919) 887-0104. Radio Station WGLD Inc. Net: Unistar. Rep: Major Mkt. Format: Adult contemp. Target aud: 25-54. ■ Bernard Mann, pres; Edward L. Weiss, gen mgr; Tom Jackson,

EXHIBIT THREE

We really enjoy your "Home Shopping Club" show. IT would be really nice if you could have it on more! We detest the wrestling, Auto Racing, & Baseball!! We like super Password & Cook and Chase also. Please try to show more Home Shopping Club. Please!

Just Maggie

Aug 27 1988

Dear WTK-Y,

I haven't found anything.
I like to watch better than
the Home Shopping Club, I have
hundreds of friends, that enjoy
it even more than the Soaps?!

If its ever possible I
would enjoy seeing it some
late night too.

I watch over minute
its own. to me it makes you
the very best channel to watch.

Mary Ellis
Herkman ST

Newton NC 28658

September 25, 1991

Mr. Jeff Long
Station Manager
WHKY
P. O. Box 1059
Hickory, N. C. 28603

Dear Mr. Long:

Just want to let you know that you have many
Home Shopping Club viewers each day.

Thank you for carrying this most helpful show.

I watch it most all day, and so do many of my
friends.

Again, thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sue", written in dark ink.

Sue Davidson

9-23-91

Mr Jeff Long, Mgr.
W H K
Hickory, NC 28603

Mr & Mrs Lynn Young
Route 10 Box 141
Pineville Road
Statesville, NC 28677

Dear Sir,
I would like to let you
know how much some friends
and myself enjoy your T.V
station. You provide a
great service to us that
live in the Lake Norman!

EXHIBIT FOUR